

**R E M A R K S**

Reconsideration of this application is respectfully requested.

Claims 1-5 were rejected under 35 USC 103 as being obvious over US 2001/0009443 ("Suemoto et al"). This rejection, however, is respectfully traversed.

Independent claim 1 recites a camera device comprising: an optical system which, upon initialization, is driven to a predetermined position when the camera device is started up in a state in which a recording mode for photographing has been set; a memory including an area for storing lens information inherent to the optical system, an area for storing a file management program, and a management area which is managed by using the file management program, the area for storing the lens information differing from the management area; and a controller which controls the initialization of the optical system based on the lens information stored in the memory when the camera device is started up in a state in which the recording mode for photographing is set, and which suspends the initialization of the optical system and starts execution of the file management program to enable the management area to be used when the camera device is started up in a state in which a playback mode for displaying is set.

The Examiner asserts that Suemoto et al inherently discloses a memory including an area for storing lens information inherent to an optical system; however, the Examiner acknowledges at the top of page 3 of the Office Action that Suemoto et al does not disclose a memory including an area for storing a file management program or a management area that is managed by using the file management program, wherein the area for storing the lens information differs from the management area.

The Examiner also asserts that it is well known to initialize hardware components in a computer system using a BIOS program, which the Examiner interprets as a "management file," and the Examiner asserts that such a BIOS program would load the operating system, which the Examiner interprets as "a file managed by the BIOS program," after the initialization of the hardware components is completed.

It is respectfully submitted, however, that the present invention as recited in independent claim 1 is not a mere inclusion of "a routine in the BIOS to initialize the optical system to a known state before loading the operating system" as suggested by the Examiner.

That is, it is respectfully pointed out that according to independent claim 1, the camera device comprises a memory including an area for storing lens information inherent to the optical system, an area for storing a file management program,

and a management area which is managed by using the file management program, the area for storing the lens information differing from the management area.

Moreover, according to independent claim 1, the camera device comprises a controller which controls the initialization of the optical system based on the lens information stored in the memory when the camera device is started up in a state in which the recording mode for photographing is set, and which suspends the initialization of the optical system and starts execution of the file management program to enable the management area to be used when the camera device is started up in a state in which a playback mode for displaying is set.

Thus, for example, according to independent claim 1, as described on page 12, line 6 to page 14, line 21, if a recording mode is set when the device is started up, an initializing operation (steps SA9 to SA14) in which the lens group 11 is zoomed open is executed, but if a playback mode is set, the initializing operation (steps SA9 to SA14) is skipped and a preparing operation for a memory area 41c is executed. Therefore, the starting time required for the playback mode is shortened by skipping the initializing operation.

Since the memory comprises different areas for (i) storing lens information inherent to the optical system and (ii) being managed by using the file management program, it is possible to

start execution of the file management program without waiting for the optical system to be driven to a predetermined position. Therefore, it is possible to perform control based on the file management program and driving of the optical system when the camera device is started up in a state in which the recording mode for photographing is set. That is, if the lens information inherent to the optical system were stored in an area managed by using the file management program, it would not be possible to start execution of the file management program until the optical system is driven to a predetermined position. In other words, it would not be possible to perform control based on the file management system and driving of the optical system simultaneously. By contrast, with the structure recited in claim 1, the camera device comprises a memory including an area for storing lens information inherent to the optical system, an area for storing a file management program, and a management area which is managed by using the file management program, the area for storing the lens information differing from the management area. Accordingly, as noted above, it is possible to start execution of the file management program without waiting for the optical system to be driven to a predetermined position.

It is respectfully submitted that, even in view of the existence of BIOS programs, Suemoto et al does not suggest a memory including three areas, including a management area which

is managed by a management program and which is different from the area for storing lens information, and a controller which is operable in at least two modes (one for when the recording mode is set and one for when the playback mode is set) using information in different ones of the areas (according to claim 1 the initialization of the optical system is based on the lens information stored in one area, whereas the management area is enabled to be used when the playback mode is set).

Instead, Suemoto et al discloses shortening the start-up processing by simultaneously driving the stepping motor 72 for focusing and the DC motor 70 for zooming (paragraph [0081] cited by the Examiner). It is respectfully submitted, therefore, that it is not necessary or obvious to modify Suemoto et al to include a startup routine as part of the POST routine of the BIOS to initialize the optical system to a known state before loading the operating system as suggested by the Examiner.

And it is respectfully submitted that even in view of the existence of BIOS programs, Suemoto et al does not disclose or render obvious the features of the memory and controller recited in independent claim 1.

Independent claim 5, moreover, recites a method for controlling a camera device, wherein the camera device comprises: (i) an optical system which, upon initialization, is driven to a predetermined position when the camera device is started up in a

state in which a recording mode for photographing has been set, and (ii) a memory including an area for storing lens information inherent to the optical system, an area for storing a file management program, and a management area which is managed by using the file management program.

According to claim 5, the method comprises: storing the lens information in the area for storing lens information in the memory, the area for storing lens information being different from the management area; and controlling the initialization of the optical system based on the lens information stored in the predetermined area when the camera device is started up in the state in which the recording mode for photographing is set, and suspending the initialization of the optical system and starting execution of the file management program to enable the management area to be used when the camera device is started up in a state in which a playback mode for display is set.

In view of the foregoing, it is respectfully submitted that even in view of the existence of BIOS programs, Suemoto et al does not disclose or render obvious independent claim 5.

And in view of the foregoing, it is respectfully submitted that independent claims 1 and 5 and claims 2-4 depending from claim 1 clearly patentably distinguish over Suemoto et al under 35 USC 103.

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Entry of this Response, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned for prompt action.

Respectfully submitted,

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